

IN THE
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KHALIL ABDUR RAHIM,
Representative of the Estate
of GREGORY MAY,
MICHAEL DATES,
and WARDELL KYLES
Plaintiff,

vs.

MICHAEL F. SHEAHAN, Sheriff of
Cook County, RICHARD REMUS,
Superintendent for External
Operations, Cook County Department
of Corrections, ERNESTO VELASCO,
Director, Cook County Department
of Corrections,
Defendants.

No. 99 C 0395

Honorable Sidney Schenkier

FILED
2002 OCT -1 PM 3:12
CLERK
U.S. DISTRICT COURT

DOCKETED
OCT 7 2002

PLAINTIFFS' SECOND MOTION FOR REIMBURSEMENT
OF PUBLICATION COSTS

The Plaintiffs, by and through their attorneys, THOMAS PETERS, KEVIN PETERS and GIL SAPIR, and request this Honorable Court enter an order for reimbursement of publication costs. In support thereof, they state as follows:

1. The parties entered into a settlement agreement that allowed for \$25,000 dollars in reimbursable costs related to publication of the class notice.

2. Plaintiffs' First Motion For Reimbursement of Publication Costs filed July 15, 2002, was granted and

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subsequently paid in full (\$10,782.09).

3. Plaintiffs' counsel have expended the following on costs related to publication since the payment of \$10,782.09.

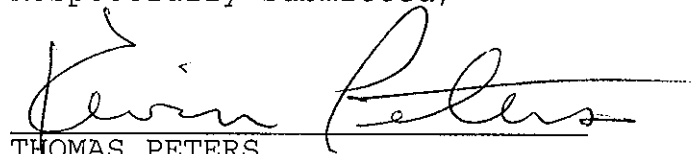
\$400.00 Street Wise Publication (Exhibit A, 3 pages)

\$369.90 Law Clerk and Kinko expenses (Exhibit B, 2 pages).

\$769.90

WHEREFORE, Plaintiffs pray the Court will enter an order requiring reimbursement in the amount of \$769.90 dollars.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kevin Peters", is written over a horizontal line.

THOMAS PETERS

KEVIN PETERS

GIL SAPIR

542 S. Dearborn, Suite 750

Chicago, IL 60605

312-697-0022

StreetWise

Exhibit A

1 of 3

1331 S. MICHIGAN AVENUE
CHICAGO, IL 60605
(312) 554-0060
FAX: (312) 554-0770
IRS 501 (C) (3) 36-3892424
www.streetwise.org

EXECUTIVE DIRECTOR
ANTHONY OLIVER

OPERATIONS DIRECTOR
DIANNE KENNER

MANAGING EDITOR
ADOLFO MENDEZ

BOARD OF DIRECTORS

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PAM McELVANE
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MARK BLANKSTEIN
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BRUCE CRANE
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DANNY K. DAVIS
U.S. CONGRESSMAN

WILLA HOLDEN
UNITED AIRLINES

JUDD HORWITZ
CERTIFIED PUBLIC ACCOUNTANT

BOB SZAFRANSKI
PUBLIC COMMUNICATIONS INC.

RHIANNON SCHMIEG
ZURICH U.S.

ZEMIRA JONES
ABC RADIO

MATT TRIPODI
CREDITBRAIN, LLC

SUE CONNOLLY
NORTHERN TRUST

EDWARD CEPHUS
VENDOR REPRESENTATIVE

RAY GILLETTE
DDB WORLDWIDE COMMUNICATIONS

FREDRIC H. FISCHER
SEYFARTH SHAW ATTORNEYS

CERTIFICATE OF PUBLICATION

I Christiana Fisher, Sales Associate of StreetWise, a newspaper as hereinafter defined. As amended June 4, 1993. StreetWise has been continuously published at regular intervals of at least once per week with a minimum of 52 issues per year for at least one year prior to the first publication of the notice, do hereby certify that StreetWise has published the Legal Notice of PROPOSED CLASS SETTLEMENT... of KEVIN PETERS & THOMAS PETERS, ATTORNEY AT LAW, which the attached is a true copy in a regular edition of said paper:

The publications were made on the 5th of AUGUST and the last publication Was made on THE 26TH of AUGUST 2002

BY


StreetWise

Subscribed and sworn before me this 5TH day of September 2002.


Notary Public



Exhibit A 2 of 3

**OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
219 SOUTH DEARBORN STREET
CHICAGO, ILLINOIS**

APRIL, 2002

NOTICE OF PROPOSED CLASS SETTLEMENT

TO: ALL CURRENT AND PAST COOK COUNTY JAIL INMATES WHO WERE TRANSFERRED FROM THE COOK COUNTY JAIL TO A HOSPITAL FOR MEDICAL CARE. IF YOU WERE TRANSFERRED FROM THE COOK COUNTY JAIL ON OR AFTER JANUARY 22, 1997, THROUGH MARCH 26, 2002, YOU ARE A MEMBER OF THE CLASS. ALL CLASS MEMBERS SHOULD CAREFULLY READ THE FOLLOWING TERMS AND CONDITIONS, BECAUSE THOSE TERMS AND CONDITIONS APPLY TO YOU AND AFFECT YOUR RIGHTS.

A case, *Rahim V. Sheahan*, No. 99 C 395, is pending in the United States District Court for the Northern District of Illinois. In that case, Plaintiffs were detained in the Cook County Jail pending their trials. Plaintiffs were, at various times, transferred from the Cook County Jail to one or more hospitals for medical care and treatment. Plaintiffs maintain that when they were transferred to these hospitals, they were shackled to their beds and denied the rights and privileges afforded to pretrial detainees who are housed in the Cook County Jail. Plaintiffs sought an order from the Court requiring Defendants, Sheriff Sheahan and members of his staff, to modify the conditions to which pretrial detainees are subjected when they are transferred to hospital. Plaintiffs also requested damages on behalf of class members.

On October 18, 2001, Magistrate Schenkler recommended that the case be certified as a class action for declaratory and injunctive relief, as well as for damages. Subsequent to that order, the parties consented to have the case heard by Magistrate Schenkler, and Defendants consented to class certification. The parties now have agreed on the terms and conditions of a settlement. As part of the settlement terms, the Sheriff of Cook County has agreed to provide more services to hospitalized detainees and to impose less restrictive conditions on them while they are hospitalized. The Sheriff also has agreed to pay damages and reasonable costs and attorneys fees to the class and to the attorneys who have represented the class. Every class member who files a timely claim shall be paid \$50.00 dollars for every day that the class member was hospitalized. However, the maximum recovery shall not exceed \$2,500.00 dollars. To share in the class damages, members of the class must submit a properly completed claim form and meet the eligibility requirements of the class.

It is incumbent upon each putative class member to accurately complete the necessary claim form and include as much of the following information as is feasible: (1) the name under which the putative class member was incarcerated; (2) date of birth; (3) social security number; (4) inmate number (if known); (5) month and year in which the detainee was hospitalized (if known); and (6) approximate number of days of hospitalization.

SETTLEMENT HEARING

The Court will hold a hearing in Courtroom 1700 on October 4, 2002, at 11:00 a.m., to determine whether the proposed settlement terms are fair. If you have an objection to the proposed terms, you must file that objection in writing with the Clerk of the United States District Court, Northern District of Illinois, 219 S. Dearborn, 20th Floor by August 30, 2002. Any Objections should include the name of the case and the case number (*Rahim V. Sheahan*, 99 C 395). It is not necessary to attend the settlement hearing on October 4, 2002, but you are allowed to attend. However, if you want to state an objection to the proposed settlement, you should indicate your intention to appear and orally object when you submit the written objection. If you support the proposed settlement, you do not need to appear for the settlement hearing.

This Notice represents a fair summary of the settlement and related matters. For more information, you may inspect the documents maintained in the United States District Court Clerk's Office, 219 S. Dearborn, 20th Floor. You also may contact, by phone or in writing, the attorneys who are representing the class. These attorneys are Thomas Peters and Kevin Peters, 542 S. Dearborn, Suite 750, Chicago, Illinois 60605, 312-697-0022.

Exhibit A

30F3

StreetWise Invoice**Customer Information:**

Kevin Peters
 Attorneys Kevin & Thomas Peters
 542 South Dearborn #750
 Chicago, Illinois 60605

Date
 7/30/02

Account Number

Invoice Number
 00001182

Purchase Order Number

Terms:
 Net 30

QTY.	ITEM #	DESCRIPTION	PRICE	DISC.%	COST
4	006	2 col. x 8" advertisement classified settlement beginning 8/5/2002 and expiring 8/21/2002	\$100.00		\$400.00

Account Executive: Chris Fisher Fisher

Thank you!

Subtotal \$400.00

Paid Today \$400.00

Amount Due: \$0.00

Tear along this line

- Make check or money order payable to StreetWise.
- Indicate your account number and invoice number on your check.
- Please return this portion with your payment.
- Remit to:

StreetWise, Inc.
 1331 S. Michigan Ave.
 Chicago, IL 60605
 312-554-0060

312-554-0060

Amount Due: \$0.00

Amount

Account Number:

Invoice Number:
 00001182

Exhibit B

10F2

PAY TO THE ORDER OF Kevin Peters

KEVIN PETERS
ATTORNEY AT LAW
PH. 312-697-0022
542 S. DEARBORN ST., STE. 750
CHICAGO, IL 60605

DATE 9/16/02

2-150/710
5610219395

3162

One thousand five hundred and no/100 DOLLARS \$1500.00

MEMO Attorney's Fee

Lakeside Bank
CHICAGO, ILLINOIS

⑆071001504⑆⑆161021900⑆⑆ 3162

Kevin Peters

3162
16290
9/14/02

HOLD SALE
Kinko's
8810 GROSS POINT RD.
SKOKIE, IL 60077
(847) 674-7670

NOT A RECEIPT

QUANTITY DESCRIPTION
745 FS BW S/S WHITE STD

SUB 67.05 TX TOT 69.90

NOT A RECEIPT

Held Sale No.: 63089
Customer: ALLEN HEATHER
Phone: (847) 492-1247
BIA BC Due Date: / /

091070 RG 5 09/15/02 17:06
Visit us @ <http://www.kinkos.com>

EXHIBIT B

Heather Allen, Law Clerk, 20 hours at \$10.00 per hour =
\$200.00. Answered phone calls, responded to written inquiries,
organized all submitted claim forms, etc.

Balance Due

\$200.00

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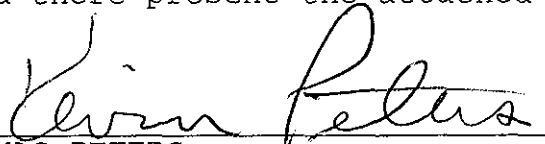
TO: Mr. Thomas M. Burnham
Michael Jacobs
Assistant State's Attorney
Richard J. Daley Center
Chicago, IL 60602

PLEASE TAKE NOTICE that on October 1, 2002, I filed with the Clerk of the United States District Court for the Northern District of Illinois, PLAINTIFFS' MOTION FOR REIMBURSEMENT OF PUBLICATION COSTS, copies of which are attached.

DOCKETED
OCT 7 2002

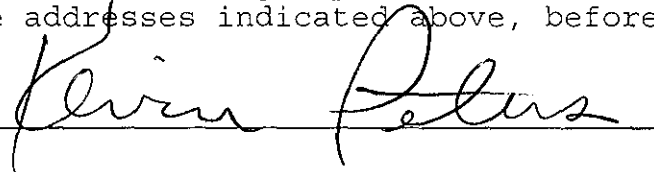
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8:30 ^{Tues} ^{8:14} PLEASE ALSO TAKE NOTICE that on Friday, October ~~X~~ 2002, at ~~11:00~~ A.M., I shall appear before Judge Sidney Schenkier in Room 1700, in the United States District Court for the Northern District of Illinois, and then and there present the attached Motion.

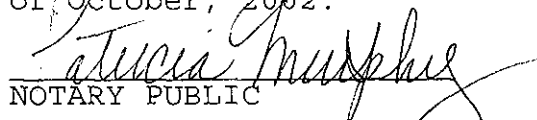

THOMAS PETERS
KEVIN PETERS
GIL SAPIR
542 S. Dearborn, Suite 750
Chicago, Illinois 60605
(312) 697-0022

CERTIFICATE OF SERVICE

I, the undersigned, do hereby swear that I served the above Notice and attached Motion by hand delivering copies to each of the above named parties, at the addresses indicated above, before 5:00 p.m. on October 1, 2002.



SUBSCRIBED AND SWORN TO
before me this 1st day
of October, 2002.


NOTARY PUBLIC

